



U.S. Department of Justice

United States Attorney
Southern District of New York

300 Quarropas Street
White Plains, New York 10601

MEMO ENDORSED

June 18, 2021

Application Granted ~~Denied~~
So Ordered.

Cathy Seibel
Cathy Seibel, U.S.D.J.

Dated: *6/18/21*

VIA ECF AND EMAIL

The Honorable Cathy Seibel
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Mehdi Moslem, et al.*, 19 Cr. 547 (CS)

Dear Judge Seibel:

The Government respectfully writes to provide an update on the defendants' release conditions, which the Court modified at a bail hearing on June 7, 2021. (See Minute Entry, June 7, 2021.) At the bail hearing, the Court increased the bond amount for each defendant to \$1 million, to be fully secured by property. (*Id.*) The Court also required the defendants to each provide four financially responsible bond co-signers, and placed both defendants on home incarceration.¹ (*Id.*)

I. Saaed Moslem's Appearance Bond

Based on the parties' discussions following the bail hearing, the Government understands that the defendants are in the final stages of selling the dealership property for Exclusive Motor Sports LLC. The Government has reviewed a closing statement from the defendants, which shows that the deal will result in approximately \$500,000 of proceeds, after closing costs. The Government is informed the deal will close on June 22, 2021. Defense counsel has agreed to receive these proceeds in escrow after closing (specifically, the Emouna & Mikhail, P.C. IOLA account), and the Government believes this amount would be sufficient to secure Saaed Moslem's modified appearance bond, in lieu of \$1 million in secured property.

Based on the foregoing, the Government respectfully proposes, with the defendants' consent, the following bail modification for Saaed Moslem:

- Defendant Saaed Moslem's appearance bond is modified to be fully secured by an additional \$500,000, based on the proceeds of the Exclusive Motor Sports

¹ The Court ordered that Mehdi Moslem's home incarceration can be modified to home detention after he satisfies the bond conditions.

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dealership sale. This amount shall be deposited with the Clerk of Court and shall be in lieu of the \$1 million fully secured bond ordered at the June 7, 2021 hearing.

- All other conditions of release, including home incarceration, remain the same.

II. Mehdi Moslem's Appearance Bond

As to Mehdi Moslem, the defense counsel has provided an April 2021 appraisal report and related documentation regarding a property owned by Mehdi Moslem on 30-15 Thomson Avenue, Long Island City, New York (the "Long Island City Property"). Although the Government does not agree with the final appraisal amount as described in Mr. Emouna's June 14, 2021 letter (ECF No. 97), the Government agrees for the limited purpose of satisfying bail conditions that Mehdi Moslem can secure his \$1 million bond against the Long Island City Property.

III. Conclusion

Based on the expected date of the Exclusive Motor Sports sale, the Government consents to a one week extension of the defendants' deadline to satisfy their bond conditions. The Government will advise the Court upon satisfaction of all bond conditions for the defendants.

Accordingly, the Government respectfully requests that the Court grant the proposed modification to Saaed Moslem's appearance bond, and the requested one week extension for the defendants to satisfy their bond conditions.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: 

Daniel Loss
Nicholas S. Bradley
James McMahon
Assistant United States Attorneys
(212) 637-6527 / (914) 993-1962 / -1936

cc: Counsel of Record (by ECF)